

File No.: 50985  
MORTON & CRAIG, LLC  
110 Marter Avenue  
Suite 301  
Moorestown, NJ 08057  
(856)866-0100  
Attorney for Credit Acceptance Corporation  
JM5630\_\_\_\_\_

IN RE:  
CARL E. OLSEN

To:

Carl E. Olsen  
215 W. Buckshutem Road  
Millville, NJ 08332  
Debtors

Seymour Wasserstrum, Esq.  
205 West Landis Avenue  
Vineland, NJ 08360  
Attorney for the debtors

Isabel C. Balboa  
Cherry Tree Corporate Center  
535 Route 38, Suite 580  
Cherry Hill, NJ 08002  
Trustee

U.S. Trustee, US Dept of Justice  
Office of the US Trustee  
One Newark Center, Suite 2100  
Newark, NJ 07102

UNITED STATES  
BANKRUPTCY COURT FOR  
THE DISTRICT OF NEW  
JERSEY

CHAPTER 13  
CASE NO: 19-16174 (ABA)  
HEARING DATE: 5-12-2020

NOTICE OF MOTION OF  
CREDIT ACCEPTANCE  
CORPORATION TO MODIFY  
THE AUTOMATIC STAY

John R. Morton, Jr., Esquire, attorney for Credit Acceptance Corporation, has filed papers with the Court for relief from the automatic stay to permit Credit Acceptance Corporation to repossess and sell the motor vehicle(s) described in the attached pleadings. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult with one.** If you do not want the Court to grant the relief sought, or if you want the Court to consider your views on the motion, then no later than seven (7) days before the hearing date, you or your attorney must:

File with the Court a written request for a hearing (or, if the Court requires a written response, an answer, explaining your position) at:

United States Bankruptcy Court  
1 John F. Gerry Plaza  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

If you mail your (request) (response) to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

John R. Morton, Jr., Esquire  
110 Marter Avenue, Suite 301  
Moorestown, NJ 08057

TAKE FURTHER NOTICE that the facts movant relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not

present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and TAKE FURTHER NOTICE that oral argument is hereby not requested.

**Attend the hearing scheduled to be held on May 12, 2020 at 10 a.m. in Courtroom #4B, United States Bankruptcy Court, 1 John F. Gerry Plaza, 4<sup>th</sup> & Cooper Streets, Camden, New Jersey 08101.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order.

Date: 4-20-2020

/s/ John R. Morton, Jr., Esquire  
John R. Morton, Jr., Esquire  
Attorney for Credit Acceptance  
Corporation